

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	NO. 2:18-md-02323-AB MDL NO.2323
Kevin Turner and Shawn Wooden, on behalf Of themselves and others similarly situated, Plaintiffs, V National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., Defendants	No. 2:12-md-02323-AB MDL NO. 2323
THIS DOCUMENT RELATES TO: ALL ACTIONS	Hon. Anita B. Brody

**MOTION TO STRIKE OBJECTION OF THE NFL
TO POST-APPEAL MONETARY AWARD DETERMINATION**

Class Counsel, The Locks Law Firm, attorneys for the Class Member whose name is currently redacted from this filing for medical privacy (hereinafter the “Class Member”), hereby moves to strike the bad faith Objection of the NFL to Special Master Wendell Pritchett’s decision to uphold the Monetary Award granted to the Class Member by the AAP and Claims Administrator.

The grounds for this Motion, which are more fully set forth in the accompanying Memorandum, are that the NFL Objection violates the plain language of Rule 32 of the Rules Governing Appeals of Claim Determinations and the NFL’s commitment to act in good faith to implement the Settlement. The NFL here seeks to appeal an un-appealable finding of fact by

Special Master Wendell Pritchett. In bad faith, the NFL seeks to create a new layer of obstruction to legitimate claims that the Claims Administrator, the AAP, and Special Master Pritchett have approved for a Monetary Award. For those reasons, the Locks Law Firm respectfully requests that the Court grant this Motion and strike the Objection as improper.

WHEREFORE, The Locks Law respectfully requests that the Court Strike the NFL Objection and enter the Proposed Order filed with this Motion that orders BrownGreer to pay the Class Member the settlement sum within the month of July, as he would have been paid absent the improper NFL Objection.

Dated: July 17, 2018

Respectfully submitted,

/s/ Gene Locks _____
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